

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

CHARLES LAMONT TAYLOR,

Plaintiff,

v.

COUNTY OF CHARLESTON;
CHARLESTON COUNTY SHERIFF'S
OFFICE; J. AL CANNON, JR., in his official
capacity as Sheriff of Charleston County;
CHARLESTON COUNTY DETENTION
CENTER; MITCH LUCAS, in his official
capacity as Administrator of the Charleston
County Detention Center; K.S. HARVEY, in
his individual capacity; J. COTTONE, in his
individual capacity,

Defendants.

C/A. No.: 2:11-CV-660-CWH

DEFENDANTS' NOTICE
OF REMOVAL

(JURY TRIAL DEMANDED)

YOU WILL PLEASE TAKE NOTICE that this entitled cause has this date been removed to the United States District Court for the District of South Carolina, Charleston Division by filing in that Court this Notice and filing in the Court of Common Pleas for Charleston County a copy of this Notice.

This is a civil suit, commenced on February 8, 2011, by the filing of a Summons and Complaint in the Court of Common Pleas for Charleston County. The Summons and Complaint, copies of which are attached, were served on the Defendants on or after February 17, 2011. Undersigned counsel will represent and appear for all Defendants.

The United States District Court has original jurisdiction over this action pursuant to the provisions of 28 U.S.C. §§ 1331 and 1343, in that the Complaint alleges causes of action under

42 U.S.C. §§ 1981, 1983, and 1988, and the deprivation of constitutional rights secured by the Constitution and laws of the United States of America.

This suit is one which may be removed to the United States District Court by the Defendants, pursuant to the provisions of 28 U.S.C. Section 1441(b), as one or more of the claims arise under the Constitution and laws of the United States of America.

S/Sandra J. Senn

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Attorney for Defendants

March 18, 2011
Charleston, South Carolina